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June 25, 2025

VIA ELECTRONIC FILING

Honorable Wendy A. Kinsella
United States Bankruptcy Court
Northern District of New York
100 South Clinton Street
Syracuse, New York 13202

Re: *The Roman Catholic Diocese of Syracuse, New York;*
Chapter 11 Case No. 20-30663

Dear Chief Judge Kinsella:

The Roman Catholic Diocese of Syracuse, New York (the “Diocese”) and the Official Committee of Unsecured Creditors (the “Committee” and together with the Diocese, the “Plan Proponents”) submit this update pursuant to the Court’s June 2, 2025 text order, and in anticipation of the upcoming adjourned confirmation hearing scheduled for July 2, 2025 at 10:00 a.m. (the “Continued Confirmation Hearing”).

As the Court is aware, the Plan Proponents have been in the process of negotiating final Insurance Settlement Agreements and have also incorporated changes requested by Interstate, LMI and other insurance carriers into a proposed *First Modified Fifth Amended Joint Chapter 11 Plan of Reorganization for the Roman Catholic Diocese of Syracuse, New York*, and a hearing to consider such modifications, as well as a *Motion to Approve the Form and Manner of Notice of the Diocese’s Motion to Approve Proposed Insurance Settlement Agreements*, are currently scheduled to be heard on July 2, 2025 at 10:00 a.m. Unfortunately, the Plan Proponents have not yet reached a settlement with Travelers¹, but efforts to reach a settlement similar to those reached with other insurers are ongoing.

¹ “Travelers” includes Travelers Insurance Company Limited, Travelers Casualty and Surety Company and Travelers Indemnity Company.

June 25, 2025
Page 2

The Plan Proponents do not anticipate presenting any further evidence in support of the Joint Plan at the Continued Confirmation Hearing.

Respectfully submitted,

BOND, SCHOENECK & KING, PLLC

/s/ Stephen A. Donato

Stephen A. Donato

cc: All ECF notice parties